

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GRACE ESTABROOK,
ELLEN HOLMQUIST, and
MARGOT KACZOROWSKI,

Plaintiffs,

v.

THE IVY LEAGUE COUNCIL OF
PRESIDENTS, PRESIDENT AND
FELLOWS OF HARVARD COLLEGE,
TRUSTEES OF THE UNIVERSITY OF
PENNSYLVANIA, and NATIONAL
COLLEGIATE ATHLETIC
ASSOCIATION,

Defendants.

Civil Action No. 1:25-cv-10281-WGY

**UNOPPOSED MOTION TO
RESCHEDULE JUNE 26, 2025,
HEARING ON DEFENDANTS’
MOTIONS TO DISMISS**

Plaintiffs Grace Estabrook, Ellen Holmquist and Margot Kaczorowski (collectively the “Plaintiffs”) by counsel, respectfully file this Unopposed Motion to Reschedule June 26, 2025, Hearing on Defendants’ Motions to Dismiss to June 21, 2025, on the following grounds:

1. On April 21, 2025, The Ivy League Council of Presidents (“Ivy League”), the President and Fellows of Harvard College (“Harvard”), the Trustees of the University of Pennsylvania (“Penn”), and the National Collegiate Athletic Association (“NCAA”) (collectively the “Defendants”), each filed a motion to dismiss, Dkt. No. 64 (Penn.), Dkt. No. 65 (Harvard), Dkt. No. 66 (NCAA), Dkt. No. 69 (Ivy League) (collectively “Motions to Dismiss”).

2. On April 22, 2025, the Court issued an Electronic Notice Setting Hearing for an in-person hearing at 2:00 p.m. on June 24, 2025, on Defendants’ Motions to Dismiss.

3. On April 24, 2025, the Indiana Supreme Court granted a petition for transfer in the case of *Taliyah Brooks v. USA Track & Field, Inc.*, Case No. 25S-PL-00103 (the “Brooks case”),

in which the undersigned is lead counsel for the Plaintiff, and scheduled in-person Oral Argument for June 5, 2025, in Indianapolis, Indiana.

4. Due to a scheduling conflict with the Oral Argument in the Brooks case scheduled for June 5, 2025, the undersigned submitted a Request for Rescheduling to the Indiana Supreme Court on April 29, 2025.

5. In response to this Request, The Indiana Supreme Court provided counsel for the parties in the Brooks case two alternative dates for rescheduling: June 24, 2025 and June 26, 2025. Since the Hearing on the Motions to Dismiss in this case (*i.e.*, the Estabrook case) was at that time set for June 24, 2025, the undersigned requested that the Indiana Supreme Court set Oral Argument in the Brooks case for June 26, 2025.

6. On April 30, 2025, the Indiana Supreme Court issued its order setting Oral Argument for Thursday, June 26, 2025, at 9:00 a.m. in Indianapolis, Indiana.

7. On May 5, 2025, this Court issued an Electronic Notice Resetting Hearing, which reset the previously scheduled June 24, 2026 hearing on Defendants' Motions to Dismiss to an in-person hearing at 2:00 p.m. on June 26, 2025.

8. Given the undersigned's prior request for the Indiana Supreme Court to reset Oral Argument, which the Court granted, the undersigned does not anticipate that he will be able to alter the date of the June 26, 2025 Oral Argument in the Brooks.

9. Given that the undersigned now has two arguments set five hours apart on June 26, 2025, in Indianapolis, Indiana and Boston, Massachusetts, the undersigned is asking this Court to reschedule the hearing on Defendants' Motions to Dismiss for a different day.

10. Counsel for Plaintiffs sent counsel for Defendants an email on May 5, 2025, explaining the reasons for Plaintiffs' request to continue the Hearing and counsel for Defendants assents to the Motion.

11. Counsel for all parties have confirmed that all are available on July 21, 2025.

WHEREFORE, the Plaintiffs, by counsel, respectfully request that the Court reschedule the June 26, 2025 hearing on Defendants' Motions to Dismiss to July 21, 2025, and for all other just and proper relief.

Dated: May 8, 2025

Respectfully submitted,

/s/ William Bock III

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ATTORNEYS FOR PLAINTIFFS

¹ *Pro Hac Vice*

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LOCAL RULE 7.1(a)(2) CERTIFICATE

I, William Bock III, hereby certify that counsel for the Plaintiffs conferred with opposing counsel regarding the issues presented in this motion, prior to filing, and opposing counsel assents to the Motion to reschedule the hearing on Defendants' Motions to Dismiss to July 21, 2025.

/s/ William Bock III

William Bock III

Dated: May 8, 2025

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of this document was filed through the Electronic Case Filing system and will be served upon the attorney of record for each party registered to receive electronic service this 8th day of May, 2025.

/s/ William Bock III

William Bock III